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March 13, 2009

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket 07-38 (Form 477 Waiver)

Dear Ms. Dortch:

On behalf of GTA TeleCom LLC ("GTA"), this is to provide for the Commission's record two affidavits in support of GTA's Request for Hardship Waiver or in the Alternative an Extension of Time, filed on February 23, 2009, in the above-referenced docket. Specifically, attached are the affidavits of Mr. Lawrence P. Perez, Director of the Guam Department of Public Works, and Mr. Michael F. Uncangco, Assistant Fire Chief and 911 Bureau Chief of the Guam Fire Department. Mr. Perez's and Mr. Uncangco's affidavits submit additional information as to the current status of geocoding of addresses throughout Guam in support of GTA's Petition.

Should any additional information be required with respect to this *ex parte* notice, please do not hesitate to contact me.

Very truly yours,

/s/ Jean L. Kiddoo

Jean L. Kiddoo
Counsel for GTA TeleCom LLC

cc (by email): Mr. Kirk Burgee
Mr. Randy Clarke
Mr. Jeremy Miller
Mr. Rodger Woock

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of)	
)	
Development of Nationwide Broadband Data)	
to Evaluate Reasonable and Timely)	
Deployment of Advanced Services to All)	WC Docket No. 07-38
Americans, Improvement of Wireless)	
Broadband Subscribership Data, and)	
Development of Data on Interconnected)	
Voice over Internet Protocol (VoIP))	
Subscribership)	

AFFIDAVIT OF LAWRENCE P. PEREZ

My name is Lawrence P. Perez. I make this affidavit in support of the hardship waiver of the GTA Telecom LLC ("GTA") in the above-captioned docket.


1. I am the Director of the Guam Department of Public Works ("DPW"). In my current capacity, I am in charge of the general administration and overall management for the DPW for the Territory of Guam. My responsibilities include the oversight & management of Horizontal & Highways Projects, Verticals & Capital Improvement Projects, Government Fleet Transportation Maintenance, Government Building Maintenance, Public Solid Waste Management, and Public & Private School Transportation. Included in my responsibilities, I have oversight of infrastructure planning, maintenance and capital improvements for roads, lands and buildings.

2. The DPW is currently in the process of surveying and geo-coding the island of Guam. The DPW has contracted with an outside surveyor and contractor to assist with the mapping of streets and roads throughout all of the villages and towns of Guam. As part of the project, the DPW will also geo-code all streets and roads throughout the island.

3. The current conditions on Guam do not provide the GTA with the ability to map its customers to accurate streets, roads, and houses that can accurately tie to back census tracts

and census blocks. It is quite common on Guam for street and road names be changed as new Mayors are elected to Villages. After the mapping project is complete, the DPW will have a complete inventory of streets and roads, and will be able to easily comply with mayoral name changes; and as all roads and streets will be geo-coded and inventoried based on GPS and accurate vertical and horizontal coordinates.

Further affiant sayeth not.

 3/13/09
Lawrence P. Perez
Director
Guam Department of Public Works

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC**

In the Matter of)	
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Development of Nationwide Broadband Data)	
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Deployment of Advanced Services to All)	WC Docket No. 07-38
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Broadband Subscribership Data, and)	
Development of Data on Interconnected)	
Voice over Internet Protocol (VoIP))	
Subscribership)	

AFFIDAVIT OF MICHAEL F. UNCANGCO

My name is Michael F. Uncangco. I make this affidavit in support of the hardship waiver filed by GTA Telecom LLC ("GTA") in the above-captioned docket.

1. I am Assistant Fire Chief and 911 Bureau Chief of the Guam Fire Department. In my current capacity, I am in charge of the administration and management of 911 services for the Territory of Guam including insuring records are updated in a timely manner from telecommunications carriers on Guam.

2. The Territory of Guam currently does have an Enhanced 911 ("E911") service implemented. However, the current 911 records are updated on a manual basis from various sources but mainly from address information supplied by GTA. Currently there is no validation of addresses through what is commonly called a Master Street Address Guide ("MSAG"). The use of an MSAG on Guam has not been implemented.

3. Current Guam law allows village mayors to change street names as new mayoral administration changes are made during election years. This law, when utilized by each village

mayor, adds to the burden of keeping an accurate list of street names and hampers the 911 Bureau of keeping an accurate and relevant address database.

4. The Guam Fire Department currently does not have geocoded maps of Guam including houses, streets, and major landmarks. GPS type services are currently not available throughout the island of Guam and not available for use by the Guam Fire Department's, 911 Bureau.

Further affiant sayeth not.



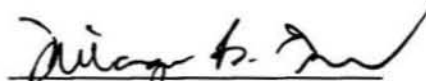
Michael F. Urcangco
Assistant Fire Chief
Guam Fire Department

ACKNOWLEDGEMENT

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) ss:
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On this 13th day of March, 2009, before me, Notary Public in and for Guam, personally appeared Michael Flores Uncangco, known to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year first above written.


Notary Public

